

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

EQUITY TRUSTEES LIMITED AS  
RESPONSIBLE ENTITY FOR T. ROWE  
PRICE GLOBAL EQUITY FUND, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, DEBORAH  
JORN, ARI S. KELLEN, and TANYA  
CARRO,

Defendants.

Case No. 16-CV-6127-MAS-LHG

**STIPULATION AND  
ORDER**

WHEREAS, on September 26, 2016, Plaintiffs in the above-captioned action (“Plaintiffs”) filed a Complaint against Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, Deborah Jorn, Ari. S. Kellen and Tanya Carro (together, “Defendants,” and together with Plaintiffs, the “Parties”), asserting federal securities claims (the “Individual Action Complaint”);

WHEREAS, on June 24, 2016 Lead Plaintiff TIAA and Plaintiff City of Tucson in the related class action, *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*, Civil Action No. 3:15-cv-07658-MAS-LHG, filed in this Court its consolidated putative class action complaint against the Defendants, also asserting federal securities claims (the “Class Action Complaint”); and

WHEREAS, Defendants filed motions to dismiss the Class Action Complaint on September 13, 2016;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the parties, as follows:

1. Each of the undersigned counsel for the Defendants in the above-captioned action is authorized to accept, and hereby does accept, service of the Summons and the Individual Action Complaint on behalf of their respective clients named therein.
2. Defendants' time to respond to the Individual Action Complaint is stayed pending the Court's decision on Defendants' motions to dismiss the Class Action Complaint;
3. Within fourteen (14) days after the issuance of an order by the Court resolving Defendants' motions to dismiss the Class Action Complaint, the Parties shall meet and confer and propose a schedule for further proceedings in this action, including the filing of any amendment and/or response to the Individual Action Complaint.

Stipulated and agreed to by:

DATED: October 4, 2016

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So Ordered this 21<sup>st</sup> day  
of October, 2016

